BEG_CTRL_NUM : DONZ00108564
END_CTRL_NUM : DONZ00108564
DATESENT : 05/10/2007
TIMESENT : 20:54:20
ERECEIVEDDATE : 05/10/2007
TIMERECEIVED : 20:54:20
EILENAME : PROCEIDA

FILENAME : Re: PREOCUPACION CONFIDENCIAL.msg
SUBJECT : Re: PREOCUPACION CONFIDENCIAL
TEXT : From: Steven Donziger <sdonziger@gmail.com>

Sent: Thursday, May 10, 2007 8:54 PM
To: Estenio <u>Fajardo</u> Mendoza <pafabide@gmail.com>
Cc: lcoca62 <lcoca62@yahoo.com.mx>
Subject: Re: PREOCUPACION CONFIDENCIAL

Re: CONCERN CONFIDENTIAL.msg
Re: CONCERN CONFIDENTIAL

[see original for email header in English] Subject: Re: CONCERN CONFIDENTIAL

Thanks jeg;//e. I recommend we come up with a plan to battle Texaco's evil. First, we need the following 1) for Richard to understand what could happen, including publicity; 2) to think of anything Richard could do AGAINST us to prove his independence; 3) to try to find ways to keep Texaco from finding out much about his plan and his work; 4) to seek third parties (through Reyes) to defend Richard, if necessary. This is vital.

Do we have Richard's CV?

Any ideas? Is Richard ready?

I recommend that Luis forward this message to the communications team.

SRD

On 5/10/07, Estenio Fajardo Mendoza, <pafabide@gmail.com> wrote:

ALSO CONFIDENTIAL

Luis and Steven

Today I met with the boss...

Everything is alright, at least that's how we left things, we talked for quite a while, he calmed down about being upset with me and we parted as good friends again.

Next Monday or Tuesday, he will issue the order that the expert be notified of his appointment.

There is no turning back, he will ratify Richard and everything that's been ordered.

He is a little afraid that Texaco might later block the expert's work... Me too, but it's manageable.

CERT. MERRILL VER: JD Page 1

Another point of concern is the work plan, which I put in the other e-mail... I believe that once the Judge swears in the expert, and he starts working, without Texaco controlling the expert's work, they're going to create a big scandal... I think we're going to need a lot of social, political, informational and guerrilla-like pressure when that happens, which will be after June 20, 2007.

Keep your eyes peeled, guys, we're entering the good part of the trial...

Pablo F

[see original for English]

FROM Steven Donziger \(\square\) sdonziger \(\alpha\) gmail.com \(\cong \)

RECIPIENT Estenio \(\frac{\text{Fajardo}}{\text{Pajardo}} \) Mendoza \(\square\) pafabide \(\alpha\) gmail.com \(\cong \)

CC \(\text{lcoca62} \) \(\left\) cloca62 \(\left\) (coca62 \(\alpha\) yahoo.com.mx \(\cong \)

CC : lcoca62 <lcoca62@yahoo.cc CUSTODIAN : Donziger, Steven

 SOURCE
 : Sent.pst

 PAGES
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 DOCTYPE
 : E-MAIL

 BOX_NO
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 ITEM_NO
 = 23281

 UPDATEDATE
 = 01/17/2011

 PRIV_DOC_NO
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MERRILL **DRPORATION**



225 VARICK STREET NEW YORK, NY 10014 • PHONE: (212) 620-5600

State of New York Estado de Nueva York)	
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County of New York Condado de Nueva York)	

Certificate of Accuracy Certificado de Exactitud

This is to certify that the attached translation is, to the best of our knowledge and belief, a true and accurate translation from Spanish into English of the attached document. Por el presente certifico que la traducción adjunta es, según mi leal saber y entender, traducción fiel y completa del idioma español al idioma inglés del documento adjunto.

Dated: January 26, 2011 Fecha: 26 de enero de 2011 Weikwang Ng (Jason) Project Manager - Legal Translations Merrill Brink International/Merrill Corporation [firmado] Weikwang Ng (Jason) Gerente de Proyecto – Traducciones Legales Merrill Brink International/Merrill Corporation

Sworn to	and signed b	efore
Jurado y f	irmado ante	
Me, this _	26 th	day of
mí, a los _	26	_días del
Jan	uary	2011
mes de	enero o	de 2011
- / /	014	_//

[firmado]

GINA ST LAURENT Notary Public, State of New York [sello]
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Commission Expires May 15, 2014

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Sent: Thursday, May 10, 2007 8:54 PM

To: Estenio Fajardo Mendoza <pafabide@gmail.com>

Cc: lcoca62 < lcoca62@yahoo.com.mx>

Subject: Re: PREOCUPACION CONFIDENCIAL

Gracias jeg;//e. Recomiendo que hagamos un plan para combatir el mal de Texaco. Primero, es necesario que 1) Richard entiende lo que pueda pasar, incluso publicidad; 2) pensamos de una cosa que pueda hacer Richard CONTRA nosotros para probar su independencia; 3) que buscamos maneras que Texaco no sabe mucho de su plan ni de su trabajo; 4) Que buscamos terceros (por medio de Reyes) para defender Richard, si necesario. Eso es clave.

Tenemos la curicula de Richard?

Ideas? Richard esta listo?

Recomiendo que Luis mande una copia de este mensaje al equipo de comunicacion.

SRD

On 5/10/07, Estenio Fajardo Mendoza <pafabide@gmail.com> wrote:

TAMBIEN CONFIDENCIAL

Luis y Stiven

Hoy me reuní con el jefe...

Todo está bien, al menos en eso quedamos, dialogamos un buen rato, se calmó de lo que estaba molesto conmigo, y quedamos como buenos amigos nuevamente.

El día lunes o martes siguiente sacará la providencia en la que ordenará que se notifique al perito para su posesión...

No hay vuelta atrás, el va a ratificar a Richard y todo lo ordenado.

El tiene un poco de miedo que luego Texaco obstruya el trabajo del Perito... yo también tengo ese miedo, sin embargo es manejable.

Un temor es el plan de trabajo, que lo pongo en el otro correo... Yo creo que una vez que el Juez posesione al perito, y éste inicie el trabajo, sin que Texaco controle el trabajo del Perito, ellos van a ser un escándalo muy fuerte... Creo que vamos a necesitar mucha presión, social, política, informativa y guerrillera para esos días, que van a ser luego del 20 de mayo de 2007.

Ojo pelao compañeros, que estamos entrando a la parte buena del juicio...

Pablo F

--

Steven Donziger 212-570-4499 (land) 212-570-9944 (fax) 917-566-2526 (cell)

Steven R. Donziger

Law Offices of Steven R. Donziger, P.C.

245 W. 104th St., #7D New York, New York 10025 Email: sdonziger@gmail.com

FROM : Steven Donziger <sdonziger@gmail.com>

RECIPIENT : Estenio <u>Fajardo</u> Mendoza <pafabide@gmail.com>

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